

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Marc E. Hirschfield
Nicholas J. Cremona

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Plaintiff,

v.

ESTATE OF JACK SHURMAN; ESTATE OF
HELEN SHURMAN; PAUL S. SHURMAN,
individually, in his capacity as Executor of the
Estates of Jack Shurman and Helen Shurman and as
beneficiary under the wills of Jack Shurman and
Helen Shurman; and WILLIAM A. SHURMAN,
individually, in his capacity as Executor of the

Adv. Pro. No. 10-05028 (SMB)

Estates of Jack Shurman and Helen Shurman, and as
beneficiary under the wills of Jack Shurman and
Helen Shurman,

Defendants.

SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: September 30, 2014.
2. Fact Discovery shall be completed by: December 4, 2015.
3. The Disclosure of Case-in-Chief Experts shall be due: February 25, 2016.
4. The Disclosure of Rebuttal Experts shall be due: March 24, 2016.
5. The Deadline for Completion of Expert Discovery shall be: April 22, 2016.
6. The Deadline for Service of a Notice of Mediation Referral shall be: June 22, 2016.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: June 29, 2016.
8. The Deadline for Conclusion of Mediation shall be: October 28, 2016.

Dated: New York, New York
September 3, 2015

DENTONS US LLP

By: /s/ Carole Neville
Carole Neville
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 768-6700
Facsimile: (212) 768-6800
carole.neville@dentons.com

Attorneys for Defendants

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Christa C. Turner
Email: cturner@bakerlaw.com
Parker G. Jordan
Email: pjordan@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and for the Estate of Bernard
L. Madoff*